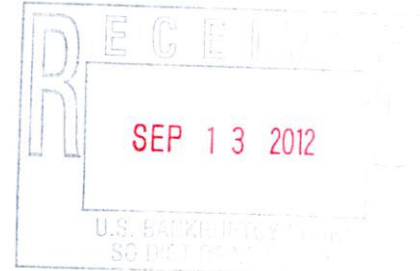


Joseph A Connor III
PO Box 1474
Cobb, CA 95426
Tel: 707-809-7093
e-mail: jaconnor3@netzero.net

Hearing Date & Time: 10 October 2012, 10 am
Return Date: 10 October 2012
Objection Deadline: 28 September 2012

Pro se Movant

UNITD STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK



In re: X

Chapter 11

RESIDENTIAL CAPITAL, LLC, (ResCap) *et al.*

Case No. 12-12020 (MG)

Debtors

X

(Jointly Administered)


**SUPPLEMENT TO CONNOR MOTION (I) SEEKING A DECLARATORY
RULING AS TO POSSIBLE VIOLATIONS OF THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that Joseph A Connor III respectfully supplements his Motion (I), DOCKET NO. 1359, now before this Court. Said Motion arises out of litigation now pending in Superior Court of Ferry County, WA—case no. 11-2-00098-6. This supplement seeks to add to Motion (I) a document captioned SUPPLEMENTAL ORDER RE PLAINTIFF'S MOTIONS FOR SANCTIONS, which should read SUPPLEMENTAL ORDER RE DEFENDANTS' MOTIONS FOR SANCTIONS. This document, dated 31 August 2012, is to be added to Motion (I) as **EXHIBIT 14**. It should be referenced in new sub-paragraph (d) of Paragraph 16 on page 6 of the Motion, as an additional action of the FerryCounty Superior Court that is at issue before this Court.

The Motion is set for hearing before the Honorable Martin Glenn, US Bankruptcy Judge for

the Southern District of New York, One Bowling Green, New York, NY 10004 on 10 October
2012 at 10 am.

Dated: 7 September 2012




Joseph A Connor III, Pro se Movant

DECLARATION OF JOSEPH A CONNOR III

1. My name is Joseph A Connor III and I am the Plaintiff in Case no. 11-2-00098-6 now
pending in Superior Court of Ferry County, WA.
2. I am over 18 years of age.
3. On the date I posted my Motions to the US Bankruptcy Court SDNY, 30 August 2012, the
document captioned SUPPLEMENTAL ORDER RE PLAINTIFF'S MOTIONS FOR SANCTIONS
(which should read SUPPLEMENTAL ORDER RE DEFENDANTS' MOTIONS FOR SANCTIONS),
was not in my possession. I received it in the post on 3 September 2012, too late to include
it as part of my two Motions.
4. I declare the above is a true and correct statement of the facts.
5. I declare the above under penalty of perjury.

Dated : 7 September 2012



Joseph A Connor, Plaintiff/Movant

EXHIBIT 14

The Honorable Allen Nielson
Noted For Presentment: August 31, 2012
Hearing Time: 10:00 a.m.
Ferry County

COPY
ORIGINAL FILED

AUG 31 2012

CLERK'S OFFICE
FERRY COUNTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF FERRY

JOSEPH A. CONNOR, III,

Plaintiffs,

v.

GMAC MORTGAGE, LLC, et. al.

Defendants.

Case No. 11-2-00098-6

~~(PROPOSED)~~ SUPPLEMENTAL
ORDER RE PLAINTIFF'S MOTIONS
FOR SANCTIONS

On or about June 8, 2012, defendants' Motion for Summary Judgment to dismiss plaintiff's Second Claim for Relief and Motion for Sanctions came before the court. The court granted defendants' motions and requested that defendants submit proof to substantiate an amount of sanctions. On or about June 15, 2012, per the court's instruction, defendants' counsel filed an attorney fee affidavit with the court evidencing that defendants incurred \$3,423.50 in costs and fees incurred in dealing with plaintiff's erroneously filed Second Claim for Relief.

The court, finding that the affidavit and attached exhibits filed by defendants properly and adequately evidences the amount of time spent by defendants in responding to plaintiff's Second Claim for Relief, and the court further finding that the amount of time spent by defendants' counsel related to plaintiff's Second Claim for

1 Relief was reasonable and necessary and that the charges for the time were also
2 reasonable and necessary, the court hereby

3 **ORDERS, ADJUDGES, AND DECREES as follows:**

4 (1) Defendants are awarded sanctions against plaintiff in the amount of
5 \$3,423.50, which reflects defendants' reasonable costs incurred in responding to
6 plaintiff's Second Claim for Relief.

7 (2) Judgment shall be entered against plaintiff and in favor of defendants in the
8 amount of \$4,923.50, the total amount of the two sanction awards against plaintiff.

9 Dated this 31 day of August, 2012.

10
11 Allen C. Nielson
12 Superior Court Judge

13 Presented In Open Court By:

14 SUSSMAN SHANK LLP

15 By

16 William G. Fig, WSBA 33943
billf@sussmanshank.com
Attorneys for Defendants

17 F:\CLIENTS\2009\0591\LEADINGS\1P- ORDER RE SANCTIONS.DOC

1 CERTIFICATE OF SERVICE


2 THE UNDERSIGNED certifies:

3 1. My name is Karen D. Muir. I am a citizen of Washington County, state of
4 Oregon, over the age of eighteen (18) years and not a party to this action.

5 2. On August 9, 2012, I caused to be delivered via first-class U.S. Mail,
6 postage prepaid, and email a copy of: **(PROPOSED) SUPPLEMENTAL ORDER RE**
7 **PLAINTIFF'S MOTIONS FOR SANCTIONS** to the interested parties of record,
8 addressed as follows:

9 Joseph A. Connor III
10 PO Box 1474
11 Cobb, CA 95426
Email: jaconnor3@netzero.net

12 I SWEAR UNDER PENALTY OF PERJURY that the foregoing is true and correct
13 to the best of my knowledge, information, and belief.

14 
15 Karen D. Muir, Legal Assistant
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26

Joseph A Connor III
PO Box 1474
Cobb, CA 95426
Tel: 707-809-7093
e-mail: jaconnor3@netzero.net

Pro se

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

_____X

In Re:

Case no. 12-12020 (MG)

RESIDENTIAL CAPITAL, LLC, *et al.*

Chapter 11

Debtors

_____X

CERTIFICATE OF SERVICE

I hereby certify that on 10 September 2012, I caused to be served true and correct copies of a Supplement to the Motions of Joseph A Connor III, Connor's Declaration, and exhibit 14, by First Class US Mail, Postage Prepaid, on all parties listed below:

William Fig
1000 SW Broadway
Suite 1400
Portland, Oregon 97205

Judson Brown/Stephen Hessler
Kirkland & Ellis LLP
665 15th Street NW
Suite 1200
Washington, D.C. 20005

**William A Hazeltine
Sullivan Hazeltine Allinson LLC
901 North Market Street
Suite 1300
Wilmington, Delaware 19801**

**Larren M Nashelsky
Morrison & Foerster LLP
1290 Avenue of the Americas
New York, New York 10104**

Dated: 10 September 2012



Caitlin Nelson